

## **DECLARATION OF BRIANNA VAZQUEZ**

I, Brianna Vazquez, hereby state as follows:

1. I am Senior Communications Administrator for Plaintiff People for the Ethical Treatment of Animals, Inc (“PETA”). I submit this declaration in support of PETA’s motion for preliminary injunction in this matter.

2. I am above the age of eighteen and of sound mind. If called upon to testify to the content of this declaration, I could do so competently.

3. On May 12, 2020, on behalf of PETA, I submitted two advertisements to Shore Transit via Vector Media, the advertising agency with which the public transit system contracts to place advertisements. Seeking to place advertisements on behalf of PETA is part of my regular job responsibilities.

4. The advertisements were intended to encourage public health officials to close the slaughterhouses on the Eastern Shore, and to encourage viewers of the advertisements to adopt a vegan diet.

5. On May 15, 2020, Vector Media Regional Manager Mark Sheely replied, “Below is the response from Shore Transit about the ads you requested to run on their buses, ‘After considerable consideration, we will decline the PETA ads. We find them too offensive for our market and political in nature.’” Attached as Exhibit A is a true and correct copy of this correspondence.

6. On June 10, 2020, counsel for PETA Gabe Walters, sent a letter on behalf of PETA to Shore Transit, addressed to Joseph Mitrecic, Chair of Tri-County Council Executive Board. I am familiar with the content of the letter. Attached as Exhibit B is a true and correct copy of this

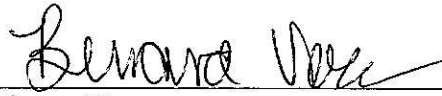
correspondence. To my knowledge, neither Mr. Walters nor any else at PETA received a response to the letter.

7. On July 22, 2021, I wrote, on behalf of PETA, to Mark Sheely to renew its request to place the proposed advertisements on Shore Transit's system. I asked for a response by July 30, 2021. Attached as Exhibit C is a true and correct copy of this correspondence. To date, I have not received a response from Mr. Sheely or anyone else on behalf of Vector Media or Shore Transit.

8. PETA wishes to place the same advertisements, and similar advertisements, in Shore Transit advertising spaces.

9. PETA anticipates that, because of PETA's mission to advocate against the purchase or creation of animal food products, Shore Transit is likely to reject those advertisements pursuant to its policy prohibiting advertisements that Shore Transit deems to be "political," "controversial," "offensive," "objectionable," or "in poor taste."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 9, 2021.

  
Brianna Vazquez